

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

MARCUS CAMPBELL,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:14-cv-00793-DGK
)	
ACCOUNTS RECEIVABLE)	
MANAGEMENT, INC.,)	
)	
Defendant.)	

**DEFENDANT’S MOTION FOR EXTENSION OF TIME TO FILE REPLY
SUGGESTIONS IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT**

Defendant Accounts Receivable Management, Inc. (“Defendant”) respectfully moves for an Order, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, granting it additional time, until January 12, 2015, in which to file reply suggestions in support of its Motion for Summary Judgment (Doc. 21). In support of this Motion, Defendant states as follows:

1. Defendant filed its Motion for Summary Judgment on November 25, 2014. Doc. 21.
2. Plaintiff served his suggestions in opposition via mail on December 16, 2014. Doc. 23.
3. Pursuant to Local Rules 6.1 and 56.1(c), and Fed. R. Civ. P. 6(d), the deadline for Defendant to file reply suggestions is January 2, 2015.
4. Due to the Christmas and New Year’s holidays, as well as the press of other business, Defendant’s counsel requires additional time to prepare reply suggestions. Defendant seeks an additional ten days, which would extend the deadline for filing reply suggestions to January 12, 2015.

4. On December 30, Defendant's counsel inquired whether Plaintiff would consent to the requested extension. As of the filing of this motion, Plaintiff has not responded to the inquiry.

5. This is Defendant's first request for an extension of this deadline.

6. No party will be prejudiced by the Court granting the requested extension of time.

WHEREFORE, Defendant respectfully requests that the Court grant this Motion and enlarge the time within which Defendant may file reply suggestions in support of its Motion for Summary Judgment, until no later than January 12, 2015.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

On December 30, 2014, the foregoing was filed electronically with the United States District Court for the Western District of Missouri, with notice of case activity generated to all counsel of record, and a copy was served via first-class, U.S. Mail, postage prepaid, and electronic mail to:

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Plaintiff, pro se

/s/ Joshua C. Dickinson

Attorneys for Defendant